

EXHIBIT A

Suggested Pattern Jury Instructions

**Volume I: Civil Cases
State of Georgia**

Fifth Edition

By the Council of Superior Court Judges of Georgia

62.670 **Strict Liability; Design Defect; Compliance with Industry Standards or Government Regulations**

In determining whether a product was defective, you may consider proof of a manufacturer's compliance with federal or state safety standards or regulations and industrywide customs, practices, or design standards. Compliance with such standards or regulations is a factor to consider in deciding whether the product design selected was reasonable considering the feasible choices of which the manufacturer knew or should have known. However, a product may comply with such standards or regulations and still contain a design defect.

Banks v. ICI Americas Inc., 264 Ga. 732 (1994)

Doyle v. Volkswagenwerk Aktiengesellschaft, 267 Ga. 574 (1997)